

Testimony of Douglas Dawson
Case 8983
March 12, 2004

1 **Q20. Does this conclude your direct testimony?**

2 A20. Yes.

CV of Douglas A. Dawson

I received a Bachelor of Science in Accounting from the University of Maryland in 1977. In addition, I received a Masters degree in Mathematics from the University of California at Berkeley in 1985. I have also taken coursework in economics, history and horticulture.

I began my telephone career in 1975 as a test technician building and testing telephone switches for Litton Industries in College Park, Maryland. In this position I performed system integration testing and learned in detail how early electronic telephone switches operate. In this job I also helped to design, build, install and test early PC boards.

My next telephone job began in 1978 with John Staurulakis, Inc. ("JSI"). JSI is a telephone consulting firm that specializes in consulting for independent telephone companies (those smaller telephone companies that are not part of the Bell System). In this job, I worked on separations cost of service studies for independent telephone companies. In this role, I had my first detailed exposure to developing the costs of providing telephone service. Additionally, I performed numerous traffic studies for telephone switches. I performed hands-on traffic studies where I measured the usage on telephone switches to determine calling patterns and to find the most efficient way to configure the switch and the network.

Next, in 1981 I became a Staff Manager of Industry Relations at Southwestern Bell Telephone Company in St. Louis, Missouri. Southwestern Bell was a huge regional telephone company that is now known as SBC. My functions there included tracking issues that impacted Bell's relationships with the independent telephone industry, calculating and negotiating various interconnection and settlement rates between companies for local calling and other network arrangements, and overseeing the review of an independent telephone company's traffic and toll cost studies. I also served for a period of time as a member of the rate case team for the Missouri operations. In working on rate cases, I further developed my knowledge of calculating and developing telephone costs.

In my next position, beginning in 1984, I gained operating telephone company experience at CP National in Concord, California. CP National was a holding company that owned, among other things, 13 telephone companies. I had several jobs with increasing responsibility. My first job was as Manager of Separations. In that role I oversaw several analysts plus the traffic engineers at CP National. My group was responsible for calculating the cost of operating our telephone company and negotiating intercompany settlements with the various Bell Companies. The traffic engineers would routinely study traffic usage on the switch and the network using various sampling plans. I was directly responsible for monitoring our telephone networks to make certain that we had sufficient facilities to satisfy customer demand. In this role, one of my first tasks in 1984 was to develop a way for CP National to bill access charges to carriers. I determined how to measure access minutes on our switches, and developed our company's first access charge rates and helped develop the first CABs billing program.

My title changed to Director of Separations and in that role I continued to oversee telephone revenues. In addition, I picked up responsibility for all of the corporate engineers at the company. These engineers were responsible for designing and maintaining all of the switches and the networks deployed by the company.

Finally I became Director of Revenues at CP National. In this job I maintained all of my previous responsibilities plus I became responsible for revenues in the gas, electric and water properties. For about one year under this title I directly supervised the telephone accounting group. My overall responsibilities included monitoring earnings, developing access and local rates, maintaining tariffs, filing rate cases, and monitoring and commenting in state and federal regulatory proceedings. In this role, I was directly responsible for setting rates and for defending those rates in front of various regulatory authorities. Thus, I testified in a number of rate-making cases and regulatory proceedings in California, Texas, Nevada, Oregon and Arizona, Utah and New Mexico. Part of my responsibility at CP National included calculating costs and setting rates for four

separate operator centers where the company maintained telephone operators for completing collect and other types of operator-assisted calls.

In 1991 I again joined John Staurulakis, Inc. My first job there was as Manager of Separations. In this role I oversaw a group who performed cost studies for telephone company clients. After a short time I was promoted to Director of Separations. In this role I oversaw a larger group performing cost studies. My final position there was as Director of Special Projects. In that capacity, I oversaw all projects and clients who were not historically part of JSI's core cost study business. Some of the projects I worked on included assisting clients in launching long distance companies and Internet service providers; studying and implementing traditional and measured local calling plans; developing optional toll and local calling plans; performing embedded cost studies, Total Element Long-Run Incremental Cost Studies ("TELRIC") and incremental cost studies for products and services; assisting in local rate case preparation and defense; and conducting cross-subsidy studies determining the embedded overlap between telephone services. In this role, I gained in-depth experience in long distance rates rate setting and the long distance regulatory process. I also became thoroughly familiar with the underlying costs and processes of running a long distance company.

In 1997, I became a founder and owner of Competitive Communications Group, LLC. My title at CCG is President and Chief Technical Officer and I am directly responsible for all of the consulting work performed by our company. The company began with 3 employees in April 1997 and currently has 18 employees. The company now goes by the name of CCG Consulting, Inc.

As a firm we offer the following telephone consulting products and services that are needed by telecommunications firms. Our clients include regulated telephone companies, CLECs, ISPs, electric companies, municipalities, long distance companies and universities. All consulting is under my direct control and supervision:

Engineering services, including:

- Analysis of telephone hardware for switching and networks;
 - Detailed network design and development;
 - Developing switching specifications and provisioning new switches into service;
 - Developing RFPs and analyzing vendors;
 - Monitoring networks for efficiency;
 - Ordering trunks (lines that connect carriers);
- Development of financial business plans;
- Market segmentation studies to understand customers and markets;
- Competitive research including rates and services of other providers;
- Strategic analysis and planning;
- Regulatory work including certification of companies to provide service, development and filing of access and local tariffs and regulatory compliance to make certain companies are meeting regulatory requirements;
- Implementation assistance for carriers including:
 - Negotiating interconnection agreements with other carriers
 - Negotiating network implementation and collocation of equipment with other carriers;
- Choosing vendors for customer billing, access billing, back office, operator services and other external requirements;
- Hands-on project management;

- Assistance in developing and implementing accounting systems;
- Development of rates;
- Calculation of costs.
- Revenue assurance;

Previous Testimony

Federal Communications Commission. 2003. In the Matter of: Martha Wright, Dorothy Wade, et al. Petition for rulemaking concerning competition in prison calling.

Oregon Public Service Commission. 2003. AAA Case No. 78 181 00113 03 JISI. Arbitration concerning Inter-carrier Compensation.

Illinois Commerce Commission. 2003. Docket No. 02-147. Complaint against Verizon concerning Interconnection Issues and Sharing of Facilities.

West Virginia Public Service Commission. 2002. Case No 02-0809-T-P. Verizon 271 Proceeding.

West Virginia Public Service Commission. 2002. Case No 02-0254-T-C. Complaint against Verizon concerning the Use of Numbers and the Sharing of Facilities.

Maryland Public Service Commission. 2002. Case No 8910. Complaint against Verizon concerning the Availability of Dark Fiber.

Maryland Public Service Commission. 2002. Case No 8921. Verizon 271 Proceeding.

Federal Communications Commission. 2002. Docket CC-01-338. Facts and Data supporting CLEC Competition.

Maryland District Court. 2002. Sealed. Case of ISP vs. Verizon.

Maryland Public Service Commission. 2001. Case No 8881. Complaint against Verizon concerning the Sharing of Facilities.

Washington Public Service Commission. 2001. Docket Number UT-000883. Investigation into Rate Zones and Loop Pricing.

New York Public Service Commission. 2001. Investigation into Unbundled Loop Pricing.

New York, Court of Claims. 2001. Case No. 103138. Competition in Prison Calling.

New York Public Service Commission. 2000. Case No. 99-C-1337. Dispute concerning Unbundled Network Pricing between ALLTEL and Fairpoint Communications, Inc.

Prior to these proceedings, I also testified approximately 50 times in the mid-1980's at the State Commissions in California, Nevada, Oregon, Washington, Texas, New Mexico, Arizona and Utah. These filings were all done on behalf of my employer, CP National, a regulated telephone company. Filings included such topics as the establishment of access charge rates, the setting of local rates, the deregulation of CPE, payphone issues, inside wiring and other issues.

Affidavit of Douglas Dawson

1. My name is Douglas Dawson. I am the Principle of CCG Consulting, Inc., which was hired by the Staff of the Maryland Public Service Commission. My business address is 6811 Kenilworth Avenue, Suite 300, Riverdale, Maryland, 20737.

2. I was a witness in Case 8983 before the Maryland Public Service Commission captioned *In the Matter of the Implementation of the Federal Communications Commission's Triennial Review Order*.


3. On March 12, 2004, I filed Direct Testimony in Case 8983 on behalf of the Staff of the Maryland Public Service Commission.

4. On March 16, 2004, the Maryland Public Service Commission stayed Case 8983.

5. I affirm that the Testimony was drafted by me or under my supervision and is true and accurate.

6. Portions of the attached Summary of the Maryland Public Service Commission Staff's Impairment Analysis were prepared by me and I reviewed the entire document. I affirm that the Summary accurately summarizes the testimony I prepared for Case 8983.

I hereby declare under penalty of perjury that the foregoing Affidavit is true and correct to the best of my knowledge.


Douglas Dawson - Principle

Date: September 30, 2004


SHERRI N. SPENCE
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires August 14, 2007

**PUBLIC SERVICE COMMISSION
OF MARYLAND**

**IN THE MATTER OF THE APPROVAL OF A BATCH CUT *
MIGRATION PROCESS FOR VERIZON MARYLAND INC. *
PURSUANT TO THE FEDERAL COMMUNICATION * CASE NO. 8988
COMMISSION'S TRIENNIAL REVIEW ORDER ***

DIRECT TESTIMONY

OF

Carlos Candelario

**ON BEHALF OF THE STAFF
OF THE
PUBLIC SERVICE COMMISSION OF MARYLAND**

February 11, 2004

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1 **INTRODUCTION AND PURPOSE OF TESTIMONY**

2
3 **Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

4
5 **A.** My name is Carlos Candelario. I am the Assistant Director of the
6 Telecommunications Division of the Public Service Commission of
7 Maryland. My business address is 6 St. Paul Street, Baltimore, MD,
8 21202.

9
10 **Q. WOULD YOU STATE YOUR BACKGROUND AND EXPERIENCE?**

11
12 **A.** My educational background and experience in the telecommunications
13 industry and its regulation are included in Exhibit A which accompanies
14 this testimony.

15
16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17
18 **A.** The purpose of my testimony is to begin the process by which Staff can
19 respond to the directives of the Federal Communications Commission
20 ("FCC") with respect to a batch hot cut process. The first directive
21 concerning batch hot cuts from the FCC is that, "...state commissions
22 must, within nine months from the effective date of this Order, **approve**

1 **and implement** (emphasis added) a batch cut process that will render the
2 hot cut process more efficient and reduce per-line hot cut costs"¹. In
3 addition, the Triennial Review Order ("TRO") declares, "State
4 commissions must approve...a batch cut migration process to be
5 implemented by incumbent LECs that will address the costs and
6 timeliness of the hot cut process"². The TRO further proclaims, "...states
7 should decide the appropriate volume of loops that should be included in
8 the batch"³. Staff therefore believes that the purpose of the instant case is
9 for the Commission to 1) approve a batch hot cut process, 2) select the
10 volume of hot cuts that comprise a "batch", and 3) address the costs and
11 timeliness of the hot cut process where the above mentioned costs are to
12 reflect TELRIC rates⁴.

13
14 **SUMMARY OF STAFF POSITION**

15
16 **Q. WOULD YOU SUMMARIZE STAFF'S POSITION?**

17
18 **A. VMD and Cavalier Telephone Mid-Atlantic, Inc. ("Cavalier") are the only**
19 parties to file direct testimony for a batch hot cut process in the instant
20 proceeding. Staff will discuss the VMD proposal and may suggest some

¹ In The Matter of Review of the Section 271 Unbundling Obligations of Incumbent Local Exchange Carriers, Report and Order and Order on Remand and further Notice of Proposed Rulemaking ("TRO") CC docket No. 01-338 (rel. Aug. 21, 2003) at ¶ 460.

² Id., at ¶ 488.

³ Id., at ¶ 489.

1 modifications in order to ensure consistency, accuracy, reliability and
2 reasonableness of the batch hot cut process. As directed by the TRO,
3 Staff is currently involved in technical workshops with the parties in the
4 instant case in order to discuss the batch hot cut process. The first
5 meeting between the parties occurred on Friday, January 23, 2004 and
6 was attended by representatives from Verizon Maryland Inc. ("VMD"),
7 AT&T, MCI, OPC and Cavalier Telephone. Covad participated by
8 teleconference. The next scheduled meeting is on Wednesday, February
9 18, 2004. The parties participating in the workshop intend to set the
10 parameters that define a reasonable number that will comprise the
11 magnitude of a batch. Finally, Staff is proposing a methodology to
12 calculate the cost of a batch hot cut on a per line basis.

13
14 **DEFINITION AND BACKGROUND**

15
16 **Q. WHAT IS A HOT CUT?**

17
18 **A.** A hot cut involves the physical removal of the customer's loop from the
19 switch of one local exchange carrier ("LEC") to the switch of another
20 LEC.⁵ The result of this action is to change the provider of dial tone to the
21 customer. Considering the case where the customer is migrating from the

⁴ *Id.* at ¶ 489.

1 incumbent LEC ("ILEC") to a competitive LEC ("CLEC"), the CLEC switch
2 would now be providing the customer with dial tone, switching, and feature
3 functionality, whereas previously it was the ILEC that provided the dial
4 tone, switching, and feature functionality. As a result, the CLEC rather
5 than the ILEC would now provide for the completion of the customer's
6 outgoing calls. Between the beginning and the end of the hot cut
7 procedure, the customer would not be able to make or receive calls.

8
9 **Q. HOW LONG WOULD THE CUSTOMER BE WITHOUT OUTGOING**
10 **SERVICE?**

11
12 **A.** The service interruption for outgoing calls is minimal if the ILEC pre-wires
13 all necessary connections; i.e. prepares jumper cables from the applicable
14 portion of the main distribution frame ("MDF") to the CLEC installation
15 which will then connect to the customer's loop. During the technical
16 workshop held at the Commission, the parties appeared to agree that the
17 out-of-service period for a basic hot cut provided by VMD was insignificant
18 when properly managed.

19

⁵ The actual transfer is performed at the main distribution frame located in the Verizon central office, where there is a connection to the CLEC's switch.

1 **Q. WHY IS THE OUT-OF-SERVICE PERIOD FOR OUTGOING CALLS**
2 **CRITICAL?**

3
4 **A.** The out-of-service period for originating calls is critical because it prevents
5 the customer from being able to complete emergency calls such as to
6 911.

7
8 **Q. HOW LONG WOULD THE CUSTOMER BE WITHOUT SERVICE FOR**
9 **INCOMING CALLS?**

10
11 **A.** The situation for incoming calls is somewhat more complex. A terminating
12 call must be able to identify the switch to which the customer's loop is
13 connected. In order to accomplish this, the customer's telephone number
14 must be ported; i.e. the customer's telephone number in the Local
15 Number Portability ("LNP") database must be removed from the ILEC
16 switch database and added to the CLEC switch database. Porting
17 involves coordination between the ILEC, the CLEC, and the Number
18 Portability Administration Center ("NPAC"). The NPAC identifies the
19 switch on which a subscriber's number resides⁶. The call can then be
20 routed to the appropriate switch. The carriers appear to agree that the
21 time interval for the entire hot cut process varies from five to fifteen

⁶ www.npac.com/LNP_Overview.htm

1 minutes with the majority of the time related to completing the porting
2 process.

3
4 **Q. IS THE HOT CUT PROCESS PREDOMINANTLY A MANUAL AFFAIR?**

5
6 **A.** Yes. The actual movement of the customer's line from one LEC switch to
7 another currently requires human intervention as does much of the
8 preliminary work needed to coordinate the process.

9
10 **Q. WHAT IS THE SIGNIFICANCE OF THE HOT CUT PROCESS TO THE**
11 **TRO?**

12
13 **A.** The availability of a viable batch hot cut process becomes critical for those
14 geographic markets where a finding of no impairment is determined for
15 local circuit switching serving mass market customers. Currently, a
16 number of ways exist for a CLEC to enter markets and compete with an
17 ILEC. In addition to reselling an ILEC's service, a CLEC may decide to
18 compete with an ILEC by obtaining an unbundled network element-
19 platform ("UNE-P") from the ILEC in order to provide end user service to a
20 customer. Unbundled network elements ("UNEs") are physical
21 components of the ILEC telecommunications network that can be leased
22 by the CLEC from the ILEC. When these components are used to provide

1 an end-to-end circuit or a complete service, the combined UNEs are said
2 to comprise a UNE platform or "UNE-P". UNE-P arrangements involve the
3 lease of both the switching and the loop from the ILEC⁷. If the CLEC
4 provides its own switching but leases the loop from the ILEC it is known
5 as a UNE loop or UNE-L arrangement. Under the TRO, if the Commission
6 makes a finding of no impairment for circuit switching that serves mass
7 market customers in a specific geographic market, the ILEC will no longer
8 be required to make the UNE-P option available to CLECs in that market
9 but will still be required to make UNE-L available at TELRIC rates. While
10 some CLECs may choose to serve their current UNE-P customers by
11 reselling ILEC services, others may choose to provide their own switches
12 and lease the loop from the ILEC (i.e. migrate customers from UNE-P to
13 UNE-L). The batch hot cut process to be approved by this Commission
14 must be capable of managing the migration of UNE-P customers to UNE-
15 L efficiently and within a reasonable timeframe.

16
17 **STAFF PROPOSAL**

18
19 **Q. WHAT IS THE STAFF RECOMMENDATION CONCERNING A BATCH**
20 **HOT CUT PROCESS?**

21

⁷ This is not an exhaustive list of the UNEs included in a UNE-P arrangement needed to provide complete service.

1 **A.** Staff will await the conclusion of the schedule of technical workshops with
2 the parties before arriving at a final proposal.

3
4 **Q.** **WHAT IS THE STAFF RECOMMENDATION CONCERNING THE**
5 **NUMBER OF INDIVIDUAL HOT CUTS TO BE INCLUDED IN A BATCH?**

6
7 **A.** The second batch hot cut process workshop is scheduled for February 18,
8 2004 and a third will be held on March 3rd, if necessary. The expectation
9 is that the parties involved will arrive at a consensus with regard to the
10 number of hot cuts to be included in a batch hot cut. If not, Staff will await
11 more information, arrive at its own conclusion, and submit its own
12 recommendation that takes into consideration the results of the workshop
13 process as well as the findings of the mass market circuit switching
14 impairment analysis.

15
16 **Q.** **WILL STAFF RECOMMEND A TIME INTERVAL FOR THE BATCH HOT**
17 **CUT PROCESS?**

18
19 **A.** Again, Staff expects that a time interval acceptable to the parties will be
20 determined by the workshop. If not, Staff will make its own
21 recommendation.

**Q. WHAT IS THE STAFF RECOMMENDATION CONCERNING A PER LINE
COST INVOLVING THE BATCH HOT CUT PROCESS?**

A. In order to ensure compliance with TELRIC principles as previously determined by the Commission, Staff is suggesting that the Hearing Examiner adopt the TELRIC rate for an individual hot cut from Case No. 8879⁸, as the foundation and ceiling for an analysis of a per line batch hot cut cost. Currently, an interim rate of \$35 is in place in Maryland as a result of the Petitions for Reconsideration/Rehearing filed by VMD, AT&T and WorldCom.⁹ In Case No. 8879, the Commission decided that non-recurring charges issued in Order No. 78552 should be stayed with the exception of 2-wire hot cut non-recurring rates. The Commission then set the interim rate subject to a true up¹⁰. Once the permanent TELRIC rate is determined by the Commission, Staff will adjust the TELRIC basic hot cut rate to reflect the efficiency improvements of the mechanized batch hot cut process to arrive at the per line TELRIC cost of a batch hot cut. Both the FCC and VMD conclude that efficiencies should be realized as a result of a batch hot cut process and that these efficiencies should result in a lower per line cost when compared to basic hot cuts¹¹.

⁸ *In the Matter of the Investigation into Rates for Unbundled Network Elements Pursuant to the Telecommunications Act of 1996*, 94 PSC Md. ____ (2003). ("Order No. 78552") issued June 30, 2003.

⁹ *In the Matter of the Investigation into Rates for Unbundled Network Elements Pursuant to the Telecommunications Act of 1996* ("Order No. 78852") issued December 19, 2003 at 5.

¹⁰ *Id.* at 7.

¹¹ TRO at ¶ 474 and VMD Panel Testimony at 32-33.

1

2 **Q. WHY NOT ACCEPT THE VMD PROPOSED RATES IN THE INSTANT**
3 **PROCEEDING GIVEN THE VMD NON-RECURRING RATES MODEL**
4 **WAS USED IN CASE NO. 8879?**

5

6 **A.** Staff is not certain that the model used in the initial testimony in the
7 instant case is precisely the same as the model used by VMD in Case No.
8 8879 to determine non-recurring costs. In Case No. 8879, the
9 Commission did in fact decide to use the VMD model to calculate both
10 recurring and non-recurring costs but changed significant inputs that had
11 an impact on the rates yielded by the model¹². In Order No. 78552 the
12 Commission decided that the hot cut rates proposed by VMD should be
13 modified¹³. This decision was based on a number of concerns about the
14 VMD methodology employed, including not only the value of many of the
15 inputs used by VMD but also factors such as the use of survey
16 questionnaires to estimate work times which the Commission found
17 unacceptable.

18

19 **STAFF CONCLUSIONS**

20

21 **Q. PLEASE SUMMARIZE YOUR CONCLUSIONS.**

¹² Order No. 78552 at 17-18.

¹³ Order No. 78552 at 97.

1 **A.** The outcome of Case No. 8983 will determine when a batch hot cut
2 process will indeed be needed in Maryland. In the interim, Staff will
3 continue to participate in the batch hot cut workshops with the expectation
4 that an acceptable process will be defined. If not, a final proposal by Staff
5 will be submitted which will address the parameters of a consistent,
6 reliable and reasonable process.

7
8 **Q.** **DOES THAT CONCLUDE YOUR TESTIMONY?**

9
10 **A.** A. Yes it does.

ATTACHMENT A
BACKGROUND AND EXPERIENCE

**Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE
IN REGULATED INDUSTRY?**

A. My education consists of a Bachelor of Science degree in Mathematics from Brooklyn College, a Master of Arts degree in Economics from Brooklyn College and a Ph.D. degree in Economics from the Graduate and University Center of the City University of New York. I have worked at two regulated companies in the telecommunications industry – AT&T and the Southern New England Telephone Company ("SNET").

At AT&T I held various positions involving rate evaluation and the forecasting of Interstate and Intrastate telecommunications services. I was the expert witness on Long Distance forecasting in the Southern Pacific II Damage Study and provided a deposition in that case.

At SNET I was the Director of Market Analysis and Forecasting. My responsibilities included being the Company expert witness on the impact of rate changes on revenue and cost and in the area of product forecasting. I have testified before the Connecticut Department of Public

Utility Control ("DPUC") on telecommunications issues involving econometrics, macroeconomics, statistics and forecasting.

I have also testified before the Maryland Public Service Commission In The Matter of the Provision of Universal Service to Telecommunications Consumers, Case Number 8745, In The Matter of the Investigation Into Rates For Unbundled Network Elements Pursuant to the Telecommunications Act of 1996, Case Number 8879 and In The Matter of the Review of Verizon Maryland Inc.'s Price Cap Regulatory Plan, Case Number 8918.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

IN THE MATTER OF

Unbundled Access to Network Elements

***Review of the Section 251 Unbundling
Obligations of Incumbent Local Exchange
Carriers***

WC Docket No. 04-313

CC Docket No. 01-338

AFFIDAVIT OF CARLOS CANDELARIO

I, Carlos Candelario, hereby make oath that the following facts, as set forth in this affidavit, are true to the best of my knowledge, information and belief.

1. I am over eighteen years of age, and am competent to testify and have personal knowledge of the facts as set out in this Affidavit.

2. I am an Assistant Director of Telecommunications of the Staff of the Maryland Public Service Commission. My business address is 6 St. Paul Street, Baltimore, Maryland 21202.

3. I was a witness in Case 8988 before the Maryland Public Service Commission ("MDPSC") captioned *In the Matter of the Approval of a Batch Cut Migration Process for Verizon Maryland Inc. Pursuant to the Federal Communications Commission's Triennial Review Order*.

4. On February 11, 2004, I filed Direct Testimony in Case 8988 on behalf of the MDPSC Technical Staff. I also prepared Rebuttal Testimony that was scheduled to be filed in Case 8988 on March 17, 2004.

5. On March 16, 2004, the Maryland Public Service Commission stayed Case 8988. As a result, my Rebuttal Testimony was not filed with the Maryland Public Service Commission.

6. I affirm that the above-referenced testimonies were drafted by me or under my supervision and are true and accurate.

7. I prepared portions of the Summary of the Maryland Public Service Commission Staff's Impairment Analysis filed in the above-captioned matter and reviewed the entire document. I affirm that the Summary accurately summarizes the testimony I prepared for Case 8988.

I hereby declare under penalty of perjury that the foregoing Affidavit signed this 29 day of September, 2004, is true and correct to the best of my knowledge.



Carlos Candelario
Assistant Director
Telecommunications Division
Public Service Commission of Maryland
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202

STATE OF MARYLAND)
) TO WIT:
CITY OF BALTIMORE)

I HEREBY CERTIFY that on this 29 day of September, 2004, before me, a Notary Public for said State and City, personally appeared the affiant and made oath in due form of law that the matters and facts hereinabove set forth are true to the best of her knowledge, information and belief.



NOTARY PUBLIC

My Commission Expires: 3/1/07